

**Remarks/Arguments**

**A. Claims in the Case**

Claims 1-7, 9-11, 13-19, 21-30, 32-34, 36-42, 44-57, 59-61, 63-69, 71-73, and 147-152 are pending.

**B. The Claims Are Not Obvious In View of Bellinger, Hinkle and Zeanah Under 35 U.S.C. §103(a)**

The Examiner rejected claims 1, 24, and 51 as being unpatentable over U.S. Patent No. 5,870,725 to Bellinger et al. (“Bellinger”) in view of U.S. Patent No. 6,442,533 to Hinkle (“Hinkle”) and further in view of U.S. Patent No. 5,933,816 to Zeanah et al. (“Zeanah”) under 35 U.S.C. § 103(a). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner*, 154 U.S.P.Q. 173, 177-78 (C.C.P.A. 1967). To establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974); MPEP § 2143.03. In addition, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Claims 1, 24, and 51 describe combinations of features including, but not limited to:

creating a highest level processing relationship object in a processing relationship structure, wherein the highest level processing relationship object represents an FSO; and

creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are descendants of the highest level processing relationship object; wherein at least one of the plurality of lower level processing relationship objects represents a company of the FSO, a business unit of the FSO, a bank branch office, a regional bank, a credit card issuer, or an acquirer

The combination of Bellinger, Hinkle, and Zeanah does not appear to teach or suggest at least the above-quoted features of claims 1, 24, and 51, in combination with the other features of the claims.

Applicant's claims are directed to a method that includes preparing a processing relationship definition for selected processing relationship object representations. Each of the processing relationship object representations correspond to part of a financial service organization. For example, Applicant's specification states:

A Financial Service Organization (FSO) is a business organization that provides financial products and/or services to customers and/or client organizations. An FSO may include one or more organizational units. Examples of organizational units include, but are not limited to, an entity, a business unit, a subsidiary, a division, a functional unit, a headquarters, an operating unit, a profit center, a regional office, and a branch office.

Figure 2a illustrates an example of an FSO business organization according to one embodiment. For example, the FSO business organization may be a global bank 2250. The FSO business units may be represented in a chart or a similar graphical form to illustrate the attributes of an FSO organization such as, but not limited to, the reporting relationship between various FSO entities, the reporting structure, the number of hierarchical levels between the highest level entity and the lowest level entity, and the number of direct reports for an FSO entity. Each FSO entity may be represented as a node or a block on an FSO organizational chart. For example, global bank is represented as node 2250, the business unit for Americas by node 2252, the business unit for Europe, Middle East and Africa by node 2254. Each node may have a parent node and one or more children nodes. For example, USA business unit 2256 has a parent node Americas

2252 and has two children nodes, region AUE 2260 and region AUW 2258. Each node may be identified uniquely with a node number and/or a name. The FSO organizational chart may include multiple levels 2266 in the hierarchical relationship. A node without a parent may be described as a root node or a level zero node. A root node may include the entire FSO organization. The global bank node 2250 may be described as a root node. The FSO organizational chart may be updated, in real-time, as new FSO entities are introduced or removed by adding or deleting a node corresponding to the FSO entity. The FSO organizational chart may thus graphically represent the current, real-world state of the FSO organization.

In one embodiment, an FSO user may create a similar or identical processing relationship structure modeled after the FSO business organization. In one embodiment, an FSO user may use a processing relationship configuration software program to configure or define the processing relationships between various FSO entities which represent the FSO business organization. In one embodiment, an FSO user may configure a node in the processing relationship structure to provide the same or similar functionality provided by the real-world FSO entity. In one embodiment, there may be a one-to-one correspondence between a node included in the FSO business organization chart and a node included in the processing relationship structure.

In one embodiment, the processing relationship structure 2276 may be based on object-oriented technology. Each node in the processing relationship structure 2276 may be represented by a software object which may be defined by the methods and properties associated with the object. For example, in one embodiment, a node may be represented by a bank object. The bank object may include properties such as, but not limited to, bank locations, ATM locations, types of customer accounts, types of loans. The bank object may include methods such as, but not limited to, add\_new\_account, add\_new\_location, delete\_current\_loan. In one embodiment, an FSO user may create various classes of objects such as a class of bank objects. A user may create an instance of the class to create, for example, a new global bank. The new global bank object may inherit all of the properties and methods associated with the class of bank objects.

Applicant's claims are directed to creating a plurality of software objects that represent various companies or branches of a financial service organization, along with a highest level object which represents the financial service organization. Applicant submits that

none of the cited references teach or suggest creating and/or using software objects to create such a model of a financial service organization.

With respect to Bellinger, the Office Action admits that the reference does not teach “creating a highest level processing relationship object in a processing structure, wherein the highest level processing relationship object represents an FSO.” To remedy the deficiencies of Bellinger, the Office Action appears to rely on Hinkle. Applicant respectfully disagrees with the Office Action’s position that Hinkle remedies the deficiencies of Bellinger with respect to Applicant’s claims.

The cited portion of Hinkle states:

FIGS. 2A and 2B is another block diagram of the present invention illustrates: (a) the high level transaction processing modules, and (b) the data tables (represented by the symbols with arcuate vertical sides) provided and maintained by the present invention. Furthermore, the present figure shows the data flows as solid arrows and control flows as dashed arrows. Moreover, this figure also indicates the data tables effected by process models No. 2 and No. 3 of the present invention.

FIG. 3 is another high level block diagram of the present invention during activation of the preprocessor and decomposer 54 wherein the solid arrows are illustrative of the data flows that occur during the activation of the preprocessor and decomposer 54. Moreover, the tables within boxes represent tables having a process model No. 1 representation, and the tables having account balancing control fields include the identifier, "CNTLS."  
(Col. 5, lines 35-51)

Referring still to FIG. 2, a high level view of the processing performed when processing a transaction 58 is provided. In particular, the transaction processing controller 54 receives an input transaction 58 and invokes the preprocessor and decomposer 54. The preprocessor and decomposer 54 subsequently performs, for each transaction 58, the following functions:

(a) determines, using input from the business enterprise databases 70, whether all necessary data for performing the transaction is available and otherwise rejects the

transaction without performing any portion thereof. In particular, the transaction preprocessor and decomposer 54 determines that all data tables to be accessed are available;

- (b) retrieves the data needed to perform the transaction;
- (c) checks to determine that the transaction operation(s) requested is available, and that the transaction is legitimate to be performed on the data for the input transaction 58;
- (d) retrieves the subtransaction data descriptors for decomposing the input transaction 58 into subtransactions.

(Col. 7, lines 19-40)

Applicant submits that nothing in the cited portions of Hinkle, or any other place in Hinkle, appear to teach or suggest the use and or creation of software objects to represent the various organizational units of a financial organization. Applicant respectfully requests that the Examiner particularly point out how Hinkle teaches or suggests the use of software objects to create a hierarchical model of a financial organization.

Applicant's claims are further directed to:

"creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are descendants of the highest level processing relationship object; wherein at least one of the plurality of lower level processing relationship objects represents a company of the FSO, a business unit of the FSO, a bank branch office, a regional bank, a credit card issuer, or an acquirer."

The Office Action appears to rely, at least in part, on Zeanah with respect to this feature. The cited portion of Zeanah states:

A transaction services set 90 provides transaction coordination and ESP message formatting and an external service provider interface services set 100 provides message sequencing and ESP interface protocols. A customer services set 110 provides customer identification, relationship, account, acquirer, and issuer services and a business services set 120 provides rule brokering and language, services. A session services set 130 provides session start up and session and delivery vehicle context.

(Col. 6, lines 29-37)

Applicant submits that nothing in the cited portions of Zeanah, or any other place in Zeanah, appear to teach or suggest the use and or creation of software objects to represent the various organizational units of a financial organization. Applicant respectfully requests that the Examiner particularly point out how Zeanah teaches or suggests the use of software objects to create a hierarchical model of a financial organization.

Applicant submits that, for at least the reasons discussed above, claims 1, 24, and 51, and the claims depending thereon, are patentable over the cited art. Applicant therefore respectfully requests removal of the 35 U.S.C. §103(a) rejections of these claims.

Applicant submits that many of claims dependent on claims 1, 24, and 51 are independently patentable. For example, claim 11 recites: "wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number for at least one of the plurality of lower level processing relationship objects and a level number for the at least one lower level processing relationship object, wherein the level number identifies a level in the processing relationship structure." The cited art does not appear to teach or suggest this feature in combination with the other features of the independent claims.

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Applicant believes no fees are due with the submission of this document. If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-30801/EBM.

Respectfully submitted,



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